

## EXHIBIT “D”



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Public Health Service  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

AUG 22 1979

Mr. Kenneth B. Basa  
National Food Ingredient Company  
4830 S. Christiana Avenue  
Chicago, Ill. 60632

Dear Mr. Basa:

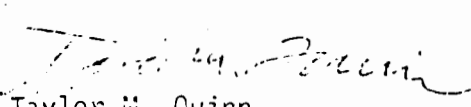
This is in reply to your letter of July 31, 1979 concerning the use of vanilla-vanillin and natural non-vanilla derived flavorings in category II Vanilla Flavored Ice Cream.

We will respond to your questions in the order in which they appear in your letter.

1. Natural flavors not derived from vanilla beans may be used in combination with the standardized items included under 21 CFR 169 (vanilla-vanillin extract or vanilla-vanillin flavoring) for category II vanilla flavored ice cream provided that the flavoring contributed by or derived from the vanilla beans predominates.
2. The combination of vanilla-vanillin extract or vanilla-vanillin flavoring with natural flavors not derived from vanilla beans as provided above may be marketed in a single package. However, such a combination should in no way imply or suggest that this combination is one of the standardized flavors covered under 21 CFR 169.
3. The labeling for the above combination flavoring should identify what the combination is, e.g. "Vanilla-Vanillin Extract and \_\_\_\_\_" (the blank to be filled with the names of the particular flavors used) or "Vanilla-Vanillin Extract with other natural flavors". The ingredient statement should declare the standardized flavoring by its specific common or usual name with a parenthetical listing of the optional ingredients required to be declared by the particular standard, and each ingredient of the natural non-vanilla flavoring should be declared by its specific common or usual names.

If we can be of further assistance, please let us know.

Sincerely yours,

  
Taylor M. Quinn  
Associate Director  
for Compliance  
Bureau of Foods